Nuclear Operating Company

South Texas Project Electric Generating Station PO Box 289 Wadsworth, Texas 77483

October 23, 2002
NOC-AE-02001415
File No.: G25
10CFR50.90

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
License Amendment Request -
Supplement to
Proposed Amendment to South Texas Project Technical Specifications to
Revise Administrative Control Requirements

Reference: Letter NOC-AE-01001146, J. J. Sheppard to U.S. Nuclear Regulatory Commission, "Proposed Amendment to South Texas Project Technical Specifications to Revise Administrative Control Requirements," dated November 5, 2001.

Pursuant to 10 CFR 50.90, STP Nuclear Operating Company (STPNOC) hereby submits this supplement to the referenced application for amendment to the South Texas Project Facility Operating Licenses NPF-76 and NPF-80.

The referenced license amendment request proposed to revise various requirements denoted in, or associated with Section 6.0 of the Technical Specifications, "Administrative Controls." These proposed changes update the Technical Specifications (TS) to be consistent with current industry standards and guidance.

During NRC review of the license amendment request, wording differences were noted between the proposed STP changes to Section 6.12 and NUREG-1431 Improved Technical Specifications standard language. As a result, STP submits the attached revised proposed changes to Section 6.12, which supercede and replace the proposed changes submitted in the referenced amendment request. Because there is no change in the intent of these revised changes with respect to the referenced submittal, STP considers these changes to be bounded by the original licensee assessment, no significant hazards consideration determination, and environmental assessment.

STI: 31501833 A001

Attachment 1 provides a detailed description of the revised proposed changes, provided in the same format as the referenced amendment request. Attachment 2 provides the revised TS mark-up pages. Attachment 3 provides a retyped copy of the affected TS pages.

STPNOC is notifying the State of Texas of this supplement to the referenced request for license amendment in accordance with 10 CFR 50.91(b).

If there are any questions regarding the proposed amendment, please contact Mr. J. R. Morris at (361) 972-8652 or me at (361) 972-7902.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 23, 2002

T. J. Jordan
Vice President
Engineering & Technical Services

JRM/
Attachments:
1. Description of Changes
2. Annotated Technical Specification Pages
3. Technical Specification Pages with Proposed Changes Incorporated

cc:
(paper copy)

Ellis W. Merschoff
Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, Texas 76011-8064

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Richard A. Ratliff
Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, TX 78756-3189

Cornelius F. O'Keefe
U. S. Nuclear Regulatory Commission
P. O. Box 289, Mail Code: MN116
Wadsworth, TX 77483

C. M. Canady
City of Austin
Electric Utility Department
721 Barton Springs Road
Austin, TX 78704

(electronic copy)

A. H. Gutterman, Esquire
Morgan, Lewis & Bockius LLP

M. T. Hardt/W. C. Gunst
City Public Service

Mohan C. Thadani
U. S. Nuclear Regulatory Commission

R. L. Balcom
Reliant Energy, Inc.

A. Ramirez
City of Austin

C. A. Johnson
AEP - Central Power and Light Company

Jon C. Wood
Matthews & Branscomb

ATTACHMENT 1

DESCRIPTION OF CHANGES

The specific revised proposed changes are identified in Table 1a below, which supercedes Items 98 through 111 of Table 1 in letter NOC-AE-01001146. A detailed description of the change type codes is provided in that letter.

TABLE 1a

Change Type Codes:
- A - Administrative
- M - More Restrictive than Current TS
- L - Less Restrictive than Current TS (other than a relocation of requirements)
- R - Relocation from Current TS to Other Licensee-Controlled Documents

#	Affected Sections	Change Type	Description of Change	Reason / Justification for Change
98	6.12.1	A	Changed "Pursuant to paragraph 20.1601(c) of 10 CFR Part 20, in lieu of the "control device" or "alarm signal" required by paragraph 20.1601(a)... defined in 10 CFR Part 20..." to "Pursuant to 10 CFR 20.1601(c), in lieu of the requirements of 20.1601(a)... defined in 10 CFR 20..."	This is an editorial change to improve grammar and readability. This requirement is consistent with NUREG-1431.

#	Affected Sections	Change Type	Description of Change	Reason / Justification for Change
99	6.12.1	A	Changed "... radiation is equal to or less than 1000 mRem/h..." to "... radiation is greater than 100 mrem/h but equal to or less than 1000 mrem/h..."	The details contained in TS 6.12.1 are revised consistent with the 10 CFR 20.1003 definition of a "High Radiation Area." Since addition of these details results in no actual change in the requirements, this is considered an editorial change. The proposed change is consistent with NUREG-1431.
100	6.12.1	A	Changed "... shall be controlled by requiring issuance of a Radiation Work Permit (RWP)." to "... shall be controlled by Radiation Work Permit (RWP)." and changed "Health Physics Technician" to "radiation protection technician"	This is an editorial change to improve grammar and readability, and to revise organizational titles to be consistent with STP terminology. The proposed changes are consistent with NUREG-1431.
101	6.12.1	A	Changed "... areas with dose rates equal to or less than 1000 mRem/h..." to "... areas with radiation levels equal to or less than 1000 mrem/h..."	This is an editorial change to improve grammar and readability. The proposed change is consistent with NUREG-1431.

#	Affected Sections	Change Type	Description of Change	Reason / Justification for Change
101 a	6.12.1	A	Created a new paragraph in the existing text.	This is an editorial change to improve grammar and readability.
102	6.12.1.a 6.12.1.b	A	Changed "; or" to "."	This is an editorial change to improve grammar and readability. The proposed change is consistent with NUREG-1431.
102 a	6.12.1.b	A	Changed "established" to "determined" and "individuals have been made" to "entry personnel are"	These wording changes are made to improve consistency with NUREG-1431 language.
102 b	6.12.1.c	M	Added new item 6.12.1.c, which adds option permitting use of remote receiver	This option was added to be consistent with NUREG-1431 requirements.
103	6.12.1.d	M	Restructured existing 6.12.1.c to add the requirement for self-reading dosimetry, and added paragraph ii. to allow the associated option for remote means of surveillance.	These changes were added to be consistent with NUREG-1431 requirements.

#	Affected Sections	Change Type	Description of Change	Reason / Justification for Change
103 a	6.12.1.d	L.5	Changed "... frequency specified by the health physics supervision in the RWP." to "... frequency specified in the RWP."	The requirement of TS 6.12.1.d pertains to the individual qualified in radiation protection responsible for providing control over the activities in a high radiation area including the performance of periodic radiation surveillances. The responsibility for specifying surveillance frequency in the RWP is not pertinent to the requirements for entering a high radiation area. RWP details are controlled by plant procedures. Deleting these details eliminates ambiguity in the TS and possible misinterpretation of the TS requirements.
104	6.12.2	L	Changed "...shall be provided with locked doors to prevent unauthorized entry, and the keys shall ..." to "...shall be provided with locked or continuously guarded doors to prevent unauthorized entry. The keys to the doors shall ..."	A guard has been determined to be an equivalent constraint for prevention of unauthorized entry into such areas. Therefore, this change does not significantly reduce the required controls, and provides an additional option for preventing unnecessary radiation exposure. The proposed change is consistent with NUREG-1431.

#	Affected Sections	Change Type	Description of Change	Reason / Justification for Change
105	6.12.2	A	Changed "... Shift Supervisor on duty and/or health physics supervision." to "... shift manager on duty or radiation protection manager."	This is an editorial change to improve grammar and readability, and to revise organizational titles to be consistent with STP terminology. Also refer to Change #6. The proposed changes are consistent with NUREG-1431.
106	6.12.2	A	Changed "...approved RWP which shall specify the dose rate levels in the immediate work areas and the maximum allowable stay time for individuals in that area." to "...approved RWP. Prior to entry, individuals shall be informed of the dose rate levels in the immediate work areas and the maximum allowable stay time for individuals in that area."	The proposed change is consistent with NUREG-1431.
107	6.12.2	A	Changed "...stay time specification of the RWP, ..." to "...stay time specification, ..."	The proposed change is consistent with NUREG-1431.

#	Affected Sections	Change Type	Description of Change	Reason / Justification for Change
108	6.12.2	A	Changed "For isolated high radiation areas..." to "For individual high radiation areas..."	The proposed change is consistent with NUREG-1431 and 10 CFR 20.
109	6.12.2	A	Changed "...such as PWR containment, ..." to "...such as reactor containment, ..."	This is an editorial change to improve grammar and readability. The proposed change is consistent with NUREG-1431.
110	6.12.2	A	Changed "...purposes of locking, and where no enclosure..." to "...purposes of locking, or that cannot be continuously guarded, and where no enclosure..."	This change is consistent with the proposed wording in Change #104, and is consistent with NUREG-1431.
111	6.12.2	A	Changed "isolated area" to "individual area" in two places	This is an editorial change to improve grammar and readability, and is consistent with the proposed wording in Change #108. The proposed change is consistent with NUREG-1431.

ATTACHMENT 2

ANNOTATED
TECHNICAL SPECIFICATION PAGES

Note to Reviewers:

These pages replace pages 43 and 44 of Letter NOC-AE-01001146, Attachment 2.

Mark-ups in this attachment include references to the list of changes presented in Attachment 1. These references are formatted as such:

<XX>,

where XX is the Change # listed in Table 1.

Insert a Page Break – Header to include
6.0 ADMINISTRATIVE CONTROLS
6.12 High Radiation Area

~~6.12 HIGH RADIATION AREA~~ <3>

6.12.1 <98> Pursuant to **10 CFR** ~~paragraph~~ 20.1601(c) ~~of 10 CFR Part 20~~, in lieu of the ~~"control device" or "alarm signal" required by paragraph~~ **requirements of** 20.1601(a), each high radiation area, as defined in 10 CFR ~~Part~~ 20, in which the intensity of

~~ADMINISTRATIVE CONTROLS~~

~~HIGH RADIATION AREA (Continued)~~ <3>

<99> radiation is **greater than 100 mrem/h but** equal to or less than 1000 mrem/h at 30 cm (12 in.) from the radiation source or from any surface which the radiation penetrates shall be barricaded and conspicuously posted as a high radiation area and entrance thereto <100> shall be controlled by ~~requiring issuance of a~~ Radiation Work Permit (RWP). Individuals qualified in radiation protection procedures (e.g., ~~Health Physics~~ **radiation protection** ~~T~~technician) or personnel continuously escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation <101> areas with **radiation levels** ~~dose rates~~ equal to or less than 1000 mrem/h, provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas. <101a> **[new paragraph]** Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

a. <102> A radiation monitoring device which continuously indicates the radiation dose rate in the area.~~; or~~

b. <102a> A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been ~~established~~ **determined** and ~~individuals have been made~~ **entry personnel are** knowledgeable of them~~; or~~.

c. <102b> **A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area.**

d~~c~~. <103> **A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,**
   i. **Be under the surveillance of** ~~A~~an individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified <103a> ~~by the health physics supervision~~ in the RWP~~.~~, **or**
   ii. **Be under surveillance by means of closed circuit television or equivalent, or personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with individuals in the area who are covered by such surveillance.**

6.12.2 In addition to the requirements of Specification 6.12.1, areas accessible to individuals with <104> radiation levels greater than 1000 mrem/h at 30 cm (12 in.) but less than 500 Rads in one hour at one meter from the radiation source or from any surface which the radiation penetrates shall be provided with locked **or continuously guarded** doors to prevent unauthorized entry.~~, and~~ The keys **to the doors** shall be maintained under the administrative control of the <105> ~~S~~shift ~~Supervisor~~ **manager** on duty ~~and~~/or radiation protection ~~supervision~~ **manager**. Doors shall remain locked except during periods of access by individuals under an <106> approved RWP. ~~which shall specify~~ **Prior to entry, individuals shall be informed of** the dose rate levels in the immediate work areas and the

maximum allowable stay time for individuals in that area. In lieu of the <107> stay time specification ~~of the RWP~~, direct or remote (such as closed circuit TV cameras) continuous surveillance may be made by individuals qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

<108> For ~~isolated~~ **individual** high radiation areas, accessible to personnel, with radiation levels of greater than 1000 mrem/h at 30 cm (12 in.) but less than 500 Rads in one hour at one meter that are located within large areas, <109> such as ~~PWR~~ **reactor** containment, where no enclosure exists for <110> purposes of locking, **or that cannot be continuously guarded,** and where no enclosure can be reasonably constructed around the <111> ~~isolated~~ **individual** area, that ~~isolated~~ **individual** area shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device.

ATTACHMENT 3

TECHNICAL SPECIFICATION PAGES WITH PROPOSED CHANGES INCORPORATED

6.12.1 Pursuant to 10 CFR 20.1601(c), in lieu of the requirements of 20.1601(a), each high radiation area, as defined in 10 CFR 20, in which the intensity of radiation is greater than 100 mrem/h but equal to or less than 1000 mrem/h at 30 cm (12 in.) from the radiation source or from any surface which the radiation penetrates shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by Radiation Work Permit (RWP). Individuals qualified in radiation protection procedures (e.g., radiation protection technician) or personnel continuously escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation areas with radiation levels equal to or less than 1000 mrem/h, provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas.

Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.

b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been determined and entry personnel are knowledgeable of them.

c. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area.

d. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,

   i. Be under the surveillance of an individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified in the RWP, or

   ii. Be under surveillance by means of closed circuit television or equivalent, or personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with individuals in the area who are covered by such surveillance.

(continued)

6.12.2 In addition to the requirements of Specification 6.12.1, areas accessible to individuals with radiation levels greater than 1000 mrem/h at 30 cm (12 in.) but less than 500 Rads in one hour at one meter from the radiation source or from any surface which the radiation penetrates shall be provided with locked or continuously guarded doors to prevent unauthorized entry. The keys to the doors shall be maintained under the administrative control of the shift manager on duty or radiation protection manager. Doors shall remain locked except during periods of access by individuals under an approved RWP. Prior to entry, individuals shall be informed of the dose rate levels in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of the stay time specification, direct or remote (such as closed circuit TV cameras) continuous surveillance may be made by individuals qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

For individual high radiation areas, accessible to personnel, with radiation levels greater than 1000 mrem/h at 30 cm (12 in.) but less than 500 Rads in one hour at one meter that are located within large areas, such as reactor containment, where no enclosure exists for purposes of locking, or that cannot be continuously guarded, and where no enclosure can be reasonably constructed around the individual area, that individual area shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device.